

DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL CONTROL  
DIVISION OF AIR AND WASTE MANAGEMENT  
SITE INVESTIGATION & RESTORATION BRANCH

**Memorandum**

TO: James D. Werner, DAWM-Director

THROUGH: Kathy Stiller-Banning, SIRB-Program Manager II *9/20/06*  
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Robert Schulte, SIRB – Analytical Chemist IV *9/20/06*

FROM: Randy Wolfe, SIRB-Analytical Chemist II *9/20/06*

RE: Draft Data Validation Section in Hazardous Substance Cleanup Act  
(HSCA) Standard Operating Procedures for Chemical Analytical  
Programs (SOPCAP)

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Please find attached the revisions to the HSCA SOPCAP which includes Section 9.2 covering data validation. This revision details the data validation requirements, and exemptions (BDA and VCP sites).

CC: Robert Schulte  
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## **9.2 Data Validation**

Data validation refers to the third party review process of the analytical data supplied by the laboratory. This review is a comprehensive assessment of the raw data to determine if the results are usable and if any qualifiers are needed. Full data packages, as defined within the HSCA SOPCAP, must be supplied for proper data validation.

DNREC will conduct data validation for Preliminary Assessment and Site Investigation (PA/SI) programs because this level of quality assurance must be maintained in accordance with United States Environmental Protection Agency (US EPA) procedures and policies.

In addition, DNREC will conduct data validation from Delaware orphan or enforcement sites that may require future litigation under HSCA or any other DNREC environmental program.

All data performed under the HSCA SOPCAP must undergo data validation using the US EPA National Functional Guidelines for data review with the following exceptions:

Analytical data from DNREC sites that have a Brownfields Development Agreement (BDA) or VCP agreement will not routinely require data validation as long as the analysis is performed by a HSCA approved laboratory. In addition, analytical data from Phase I or Phase II Environmental Site Assessments (ESA) that are not under DNREC oversight and are performed by a HSCA approved consultant for use as Facility Evaluations (FE) will not require data validation providing the HSCA approved laboratory is utilized. DNREC maintains oversight of the laboratory approval process as well as a list of approved labs. DNREC, at its discretion, may determine that site specific data validation is warranted and will communicate this need to the appropriate parties.

Although data validation will not be routinely required for Brownfields or VCP sites, it is essential that each data report be reviewed for accuracy and completeness. This includes the following items:

All Tentatively Identified Compounds (TICS) must be evaluated for potential impact on the site assessment and their effect on any potential remediation.

Analysis results should be compared to any past data results and any available screen data to insure precision and accuracy. A direct comparison of field screening data and the fixed laboratory data must be included in all reports. Any inconsistencies must be investigated. This investigation will include a confirmation of the analytical results from the fixed laboratory.

Any non-conformance issue reported by the laboratory will be reviewed for potential impact on the data.

For a comprehensive evaluation of the analytical chemistry data, please refer to section 9.1 to insure all pertinent information has been provided by the laboratory.

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